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SEATTLE, WASHINGTON 98195

School of Medicine and College of Engineering
Center for Bioengineering
Bioelectromagnetics Research Laboratory, ~~RJ-10~~ 356490

March 14, 1996

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: Ex Parte Presentation Concerning ET Docket No. 93-62
(Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation)

Dear Mr. Caton:

Please include the attached letter in the record of the above referenced proceeding. Please address any questions concerning this submission to the undersigned.

Thank you in advance for considering my comments.

Sincerely,

Arthur W. Guy

Arthur W. Guy, Ph.D.
Emeritus Professor

Attachment

cc: Chairman Reed E. Hundt
Commissioner James H. Quello
Commissioner Andrew C. Barrett
Commissioner Susan Ness
Commissioner Rachelle B. Chong
Richard M. Smith, Chief, OET

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March 14, 1996

Honorable Reed E. Hundt
Chairman
Secretary
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Re: Ex Parte Presentation Concerning ET Docket No. 93-62
(Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation)

Dear Mr. Chairman:

As the Chairman of the subcommittee that developed the ANSI C95.1-1982 radiofrequency exposure standard which formed the basis of subsequent improved standards, Vice-Chairman of the committee that developed the IEEE/ANSI C95.1-1992 standard and the Chairman of the committee that developed the 1986 NCRP radiofrequency exposure standard, I would like to submit my views for inclusion in the above referenced proceeding.

I believe that it would be a mistake for the FCC to adopt the older 1986 NCRP standard at this time considering the fact that newer and more advanced standards have been developed since the publication of the NCRP standard. In fact at this time the NCRP is in the process of modifying its old standard by incorporating the results of new research and technology to bring it up to date with, and possibly more advanced than, the more recent standards through the efforts of its newly formed scientific committee, SC 89-5.

Some of these advances included in the new IEEE/ANSI C95.1-1992 standards are:

(1) extension of the frequency range to include the entire radiofrequency (rf) communication and broadcast band,

(2) extension of the guidelines to include contact and induced current hazards not covered in the older NCRP standard,

(3) extension of the guidelines to provide protection against well known shock and rf burn hazards,

(4) extension of the guidelines to replace some of the expensive and impractical procedures for validating safe whole-body average and peak SARs during exposure of human tissues to rf fields by significantly less expensive and simpler scientifically based methods. The former methods require specially equipped laboratories staffed by bioelectromagnetics trained scientists and engineers which are in short supply and beyond the reach of all but the largest companies and businesses. The latter methods, on-the-other-hand, can be implemented in the field and at the radiation site through the use of common off-the-shelf survey instrumentation operated by technicians, industrial hygienists, and health physicists who are readily available and accessible by even the smallest companies and organizations,

(5) provides companion tutorial documentation on instrumentation and methodologies for insuring compliance with the standard,

(6) provides a free service for interpretation of the guidelines when situations and questions come up concerning their application, and

(7) the guidelines are under continuous review by over 100 interdisciplinary scientific committee members representing the general public, industry, private and university laboratories, and governmental laboratories for insuring that the standard is based on and compatible with the latest scientific literature and improvements in technology.

In addition to the above, many local governments have adopted the ANSI/IEEE C95.1-1992 Standard so that current rf communications and broadcast installations at locations under their jurisdiction are already in compliance with the standard.

If the FCC chooses to adopt the NCRP standard, they will have to devote considerable effort and expense to address the problems that it does not cover and to make it practical to enforce, essentially repeating the work that it took more than 100 scientists to do over a period of a

decade. I strongly urge the FCC to adopt the ANSI/IEEE C95.1-1992 Standard as proposed in the 1993 NPRM, presented in ET Docket No. 93-62.

Sincerely,

Arthur W. Guy, Ph.D.
Emeritus Professor

Attachment

cc: Commissioner James H. Quello
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